

SPEARS & IMES LLP

51 Madison Avenue  
New York, NY 10010  
tel 212-213-6996  
fax 212-213-0849

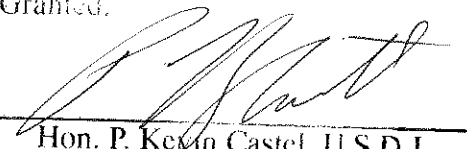
Reed M. Keefe  
tel 212-897-4485  
rkeefe@spearsimes.com

June 3, 2022

**BY ECF**

Application Granted.

The Honorable P. Kevin Castel So Ordered:  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

  
Hon. P. Kevin Castel, U.S.D.J.  
6-7-22

Re: *United States v. Kenneth Wynder and Andrew Brown*,  
S1 20 Cr. 470 (PKC)

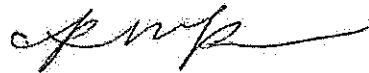
Dear Judge Castel:

We represent defendant Andrew Brown in the above-captioned matter. In connection with Mr. Brown's opposition to the Government's motions *in limine* ("Opposition"), filed today, and pursuant to the Protective Order filed in this case (ECF 54, ¶ 4), we respectfully request permission to: (1) file the exhibits to the Opposition, which contain documents designated Confidential by the Government, under seal; and (2) redact the portions of the Opposition that refer to those exhibits and to other evidence the Government has designated Confidential.

We are providing to Your Honor's Chambers, the Government, and counsel to co-defendant Kenneth Wynder copies of this letter and the unredacted Opposition and exhibits thereto.

Thank you for your consideration of this request.

Respectfully submitted,



Reed M. Keefe